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November 19, 2012

VIA HAND DELIVERY

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square – Suite 100 (Mail Code ORA18-1)
Boston, MA 02109-3912

NOV 1 9 2012
Office of Regional Hearing

Re:

The Moore Company (Fulflex Division)

Docket No. CAA-01-2012-0085

Dear Clerk:

Pursuant to 40 CFR § 22.5, I enclose the original and one copy of The Moore Company's (Fulflex Division) Second Motion for an Extension of Time to Respond to the Complaint.

Should you have any questions, please contact me.

Very truly yours,

Rhiannon A. Campbell

RAC

Enclosures

cc: Laura J. Beveridge, Esq. (w/ enc.) (via Hand Delivery)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 1

RECEIVED NOV 1 9 2012

IN THE MATTER OF	Office of Regional Hearing Clerk Docket No. CAA-01-2012-0085
The Moore Company (Fulflex Division) 32 Justin Holden Drive Brattleboro, Vermont)))))
Proceeding under Section 113 of the Clean Air Act)))

SECOND MOTION FOR AN EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Respondent, The Moore Company (Fulflex Division) ("Fulflex") respectfully moves for the entry of an Order extending the time for Fulflex to answer or otherwise respond to the Complaint up to and including December 14, 2012. The Environmental Protection Agency ("EPA") has no objection to the requested extension.

In support of this Motion, Fulflex states as follows:

- 1. The EPA commenced this action on September 18, 2012.
- 2. Fulflex accepted service of the Complaint on September 21, 2012.
- 3. The deadline for Fulflex to answer or otherwise respond to the Complaint was October 21, 2012.
- 4. Fulflex was granted an Order extending the time for Fulflex to answer or otherwise respond to the Complaint up to including November 21, 2012.
- 5. The parties have engaged in, and continue to engage in, settlement discussions.

- 6. This extension is requested so that the parties may continue to try to negotiate a settlement of this matter before committing further resources to the litigation of this matter.
- 7. EPA has no objection to the requested extension of time, namely up to and including December 14, 2012, to answer or otherwise respond to the Complaint.
- 8. Fulflex submits that, given the nature of the relief being requested herein, no memorandum of law is required for this Motion.

WHEREFORE, Fulflex respectfully requests entrance of an Order:

- A. Granting this Motion and extending the deadline for Fulflex to answer or otherwise respond to the Complaint up to and including December 14, 2012; and
 - B. Awarding such other relief as is just and proper.

The Moore Company (Fulflex Division),

By its attorneys,

Robin L. Main (BBO No. 556074)

Rhiannon A. Campbell (BBO No. 682193)

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Dated: November 19, 2012

CERTIFICATE OF SERVICE

I, Rhiannon A. Campbell, Esq., hereby certify that on November 19, 2012, I served a copy of the foregoing document in the above-captioned matter via hand delivery to Laura J. Beveridge, Enforcement Counsel, U.S. Environmental Protection Agency, Region 1, 5 Post Office Square – Suite 100 (Mail Code OES04-3), Boston, Massachusetts 02109-3912.